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**CIVIL ACTION NO.  
SA-14-CA-0952-HLH**

**v.**

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Defendant.

**PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
RESPONSE TO DEFENDANT'S MOTION FOR SUMMARY JUDGEMENT
TO ON OR BEFORE AUGUST 17, 2015**

TO THE HONORABLE SENIOR UNITED STATES DISTRICT JUDGE:

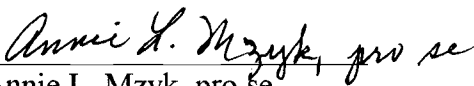
Plaintiff Annie L. Mzyk, pro se (“Plaintiff”) respectively files this Unopposed Motion for Leave for an Extension of Time to August 17, 2015 to File a Response to Plaintiff’s Motion for Summary Judgment previously filed on Friday, July 24, 2015.

The Response was to be due on August 7, 2015 with an extension request to August 12, 2015. However, the Plaintiff recently suffered a few days of a stomach “bug” and diarrhea. Plaintiff has diabetes and is also recovering from leukemia and aplastic anemia. Additional time is needed to fairly address the 40 page Plaintiff’s Motion for Summary Judgment. The Defendant’s Motion was 40 pages in length, 30 more than allowed by the Court’s Scheduling order due to a diversity of legal issues and multiple causes of action. Plaintiff previously agreed to Defendant’s request for leave to file a motion exceeding the 10 page limit.

Conclusion:

Good cause exists to permit pro se Plaintiff an extension time to on/or before August 17, 2015 to file a Response to Defendant's Motion for Summary Judgment.


Respectively submitted,


Annie L. Mzyk, pro se
Plaintiff

CERTIFICATE OF CONFERENCE

I hereby certify that on August 11, 2015, the undersigned Plaintiff, pro se, conferred with Allen M. Keller, counsel for the Defense, regarding the extension of time to August 17, 2015 for filing a response to the Motion for Summary Judgment.


Respectively submitted,


Annie L. Mzyk, pro se
Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on August 12, 2015, the foregoing has been served upon Defendant's Council in this proceeding, via Certified Mail Return Receipt Requested as follows:

Mr. Allen M. Keller
Mr. Ricardo R. Lopez
Schulman, Lopez & Hoffer LLP
517 Soledad Street
San Antonio, TX 78205


Annie L. Mzyk, pro se
Plaintiff